

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

HENRY M. DAVIS,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 10-cv-1429 NAB
)	
JOHN BEAIRD,)	
)	
Defendant, and)	
)	
MICHAEL WHITE,)	
)	
Counterclaim Plaintiff,)	
)	
v.)	
)	
HENRY M. DAVIS,)	
)	
Counterclaim Defendant.)	

***DEFENDANT OFFICER JOHN BEAIRD AND
COUNTERCLAIMANT OFFICER MICHAEL WHITE'S JOINT
PROPOSED LIST OF EXHIBITS***

COME NOW Defendant Ferguson Police Officer John Beaird, and Counterclaim Plaintiff Ferguson Police Officer Michael White, by and through the undersigned counsel, and for their Joint Proposed List of Exhibits in Response to Order of Court Relating to Trial (Doc. Nos. 48 and 170) state as follows:

OFFICERS BEAIRD AND WHITE'S PROPOSED LIST OF EXHIBITS

A. Exhibits which may be introduced:

Deft – A: City of Ferguson Police Department Police Report;
Deft – B: City of Ferguson Police Department Use of Force Report;

Deft – C: John Beaird’s Probable Cause Affidavits;
Deft – D: White Employee Injury Form;
Deft – E -2505 to 2524: Ferguson Jail Inspection Photos;
Deft – F: Jail Log Book Entries;
Deft – G: Affidavit with Christian Hospital EMS;
Deft – H: Group Exhibit: Medical Records of Michael White;
Deft – I: Criminal File Ferguson v. Davis;
Deft – J: September 20, 2009 Christian Hospital records of Plaintiff;
Deft-K: Highway Map of St. Louis Metro Area.

Ferguson Police Officers Beaird and White may seek to authenticate business records by affidavit or declaration pursuant to Fed. R. Evid. 902(11) if there is no stipulation to their authenticity.

Officers Beaird and White reserve the right to identify as an exhibit any exhibit identified by Plaintiff Henry Davis in his Compliance with the Trial. Officers Beaird and White further reserve the right to identify additional exhibits for the purposes of impeachment or for any other purpose allowed by law.

/s/ Peter J. Dunne

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I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 4th day of March, 2014 to be served by operation of the Court's electronic filing system upon the following:

Mr. James W. Schottel, Jr.
Attorney for Plaintiff
906 Olive Suite PH
St. Louis, Missouri 63101

/s/ Peter J. Dunne

March 4, 2014